

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-294-JRG
)	
MICRON TECHNOLOGY, INC.; MICRON)	JURY TRIAL DEMANDED
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	
)	

JOINT NOTICE OF PENDING MOTIONS

Pursuant to the Court’s Order, the Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC respectfully submit the following list of pending motions in the above-captioned case.

	Dkt.¹	Motion Description
1.	288 (22-cv-293)	Micron Motion to Stay Pending Resolution of IPR
2.	340 (22-cv-293)	Netlist Motion for Summary Judgment re Micron RAND Defense
3.	345 (22-cv-293)	Micron Motion for Summary Judgment re Non-infringement of '912 and '417 Patents
4.	354 (22-cv-293)	Netlist Motion to Strike Lynde
5.	358 (22-cv-293)	Netlist Motion to Strike Halbert
6.	360 (22-cv-293)	Micron Motion to Strike Kennedy
7.	362 (22-cv-293)	Netlist Motion for Summary Judgment Asserted Patents Not Standard Essential

¹ Motions filed before the Court’s de-consolidation order were filed in the previous lead case (22-cv-293), motions filed after that order are filed in the separate docket for this case (22-cv-294). The table below specifies the docket in which the motion was filed.

8.	364 (22-cv-293)	Netlist Motion to Strike Stone
9.	366 (22-cv-293)	Netlist Motion for Summary Judgment on Micron Affirmative Defenses
10.	367 (22-cv-293)	Micron Motion for Summary Judgment on Pre-Suit Damages
11.	368 (22-cv-293)	Micron Motion to Strike Gillingham
12.	369 (22-cv-293)	Micron Motion to Strike Mangione-Smith
13.	370 (22-cv-293)	Micron Motion for Summary Judgment Lack of Written Description for US Patent '417
14.	607 (22-cv-293)	Netlist's Motion for Consolidation
15.	608 (22-cv-293)	Netlist's Motion for Leave to Supplement Expert Reports
16.	610 (22-cv-293)	Netlist's Motion in Limine in Micron Case
17.	613 (22-cv-293)	Micron's Omnibus Motion in Limine
18.	660 (22-cv-293)	Micron's Motion to Compel Production of Expert Deposition Transcript from Lead Case
19.	38 (22-cv-294)	Micron's Motion for Leave to Supplement Dispositive Motions and Motions to Strike Based on Deposition Testimony Obtained After Briefing Closed
20.	40 (22-cv-294)	Micron's Motion for Leave to Supplement Dr. Matthew Lynde's Expert Report

Dated: March 4, 2024

Respectfully submitted,

/s/ Jason G. Sheasby

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 East Houston Street Suite 300
Marshall, TX 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Yanan Zhao (*pro hac vice*)
yzhao@irell.com
Michael W. Tezyan (*pro hac vice*)

mtezyan@irell.com

IRELL & MANELLA LLP

1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel. (310) 277-1010
Fax (310) 203-7199

Attorneys for Plaintiff Netlist, Inc.

By: /s/ Michael R. Rueckheim

Thomas M. Melsheimer
State Bar No. 13922550
TMelsheimer@winston.com

Natalie Arbaugh
State Bar No. 24033378
NArbaugh@winston.com
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
Telephone: (214) 453-6500
Facsimile: (214) 453-6400

David P Enzminger (pro hac vice)
denzminger@winston.com
WINSTON & STRAWN LLP
333 South Grand Avenue, 38th Floor
Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
Facsimile: (213) 615-1750

Michael R. Rueckheim
State Bar No. 24081129
MRueckheim@winston.com
WINSTON & STRAWN LLP
255 Shoreline Drive, Suite 520
Redwood City, CA 94065
Telephone: (650) 858-6500
Facsimile: (650) 858-6559

William M. Logan
State Bar No. 24106214
wlogan@winston.com
Juan C. Yaquian

Pro Hac Vice

State Bar No. 24110559
JYaquian@winston.com
WINSTON & STRAWN LLP
800 Capital Street, Suite 2400
Houston, TX 77002-2925
Telephone: (713) 651-2600
Facsimile: (713) 651-2700

Wesley Hill
State Bar No. 24032294
wh@wsfirm.com
Andrea Fair
State Bar No. 24078488
andrea@wsfirm.com
Charles Everingham IV
State Bar No. 00787447
ce@wsfirm.com
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
Telephone: (903) 757-6400
Facsimile: (903) 757-2323

**ATTORNEYS FOR DEFENDANTS
MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., AND
MICRON TECHNOLOGY TEXAS LLC**

CERTIFICATE OF SERVICE

I hereby certify that, on March 4, 2024, a copy of the foregoing was served to all counsel of record.

/s/ Yanan Zhao
Yanan Zhao